

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

ANTHONY BAYAD,

Plaintiff,

v.

JOHN CHAMBERS, PATRICIA RUSSO,
ANTHONY SAVASTANO, and
CARL WIESE,

Defendants.

2005 FEB 28 P 3:47

U.S. DISTRICT COURT
DISTRICT OF MASS.
CIVIL ACTION NO. 04-10468-GAO

DECLARATION OF ANTHONY SAVASTANO

I, ANTHONY SAVASTANO, declare under the pains and penalties of perjury, pursuant to 28 U.S.C. § 1746, the following:

1. I am a Vice President of Finance for Cisco Systems, Inc. ("Cisco"). I have worked at Cisco's San Jose, California facility since April 28, 2000.
2. I submit this declaration in support of the Motion for Summary Judgment of myself, John Chambers and Carl Wiese in connection with the captioned matter.
3. I had no involvement with and have no personal knowledge of the facts surrounding Anthony Bayad's employment with Cisco.
4. I did not interact in any way with Mr. Bayad during the period of his employment with Cisco and have not interacted with Mr. Bayad at any time since June 24, 1998 when I was deposed in connection with Mr. Bayad's lawsuit against Lucent Technologies, myself and others.
5. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's employment with Cisco, the termination of his employment, or

Mr. Bayad's alleged subsequent attempts to obtain re-employment with Cisco or employment elsewhere.

6. I have no involvement with the administering or scoring of Cisco Certified Internetworking Engineer ("CCIE") certifications.

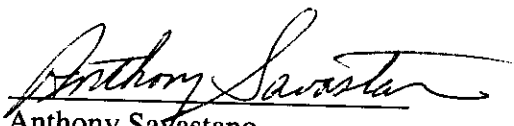
7. To my knowledge, Cisco does not maintain a no-hire list targeting minorities as alleged by Mr. Bayad.

8. My attorneys have provided me with a copy of the "no-hire" list Mr. Bayad produced in the course of this litigation. I have never seen it before. I never placed or instructed anyone to place Mr. Bayad's name on a "no-hire" list. Nor did I ever instruct anyone at Cisco not to hire, promote, or transfer Mr. Bayad.

9. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's alleged attempts to foster any type of business relationship with Cisco or any other entity, on behalf of himself or any affiliated entity.

10. I have never communicated with John Chambers about Mr. Bayad. Since 1997, I have had no communications with Carl Wiese about Mr. Bayad.

February 15, 2005


Anthony Savastano